

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Vanida Khautisen, as Personal Representative of)
the Estate of Khouanexay Bill Sivilay,)

PLAINTIFF,

V.

BHG Holdings, LLC, and BHG XXXVIII, LLC,

DEFENDANTS.

C.A. No. 7:21-cv-03775-TMC

**DEFENDANT BHG HOLDINGS,
LLC’S MOTION FOR PROTECTIVE
ORDER AND/OR TO QUASH
NOTICE OF DEPOSITION OF BHG
HOLDINGS, LLC’S EXECUTIVE
OFFICER**

Defendant BHG Holdings, LLC, by and through their undersigned counsel, and pursuant to Rules 26 and 45, F. R.C.P., respectfully MOVES this Honorable Court for a Protective Order and/or to Quash the Notice of Deposition of BHG Holdings, LLC's Chief Executive Order.

Defendant BHG Holdings, LLC's Memorandum in Support of its Motion will be submitted to the Court, whereby all supporting positions for Defendant BHG Holdings, LLC's Motion will be set forth.

WHEREFORE, Defendant BHG Holdings, LLC respectfully asks this Court to Quash and/or enter a Protective Order against the Notice of Deposition of BHG Holdings, LLC's Executive Officer.

Respectfully submitted,

s/ Chance M. Farr

Chance M. Farr

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Counsel for Defendant BHG Holdings

This the 26th day of July 2023.